



ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS
3700 COMMERCE BOULEVARD
KISSIMMEE, FLORIDA 34741

Via Overnight Delivery and Electronic Comment Filing Submission (ECFS)

November 29, 2016

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51;
Telecommunications Relay Services and Speech-to-Speech Services for Individuals
with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Chairman Wheeler:

As the sole provider of specialized video relay services (“VRS”) to the Spanish language and Deaf-Blind Deaf Community we write to ask you, your fellow commissioners, and the Consumer and Government Affairs Bureau (“CGB”) to expeditiously approve a refreshing of the VRS reimbursement methodology to encourage Telecommunications Relay Service Fund (“Fund”) sustainability, meaningful competition and most importantly, to ensure that the Deaf Community does not fall victim to a monopoly VRS provider by default. Time is running out for GlobalVRS and indeed for all smaller VRS providers;¹ Commission action is imperative.

We have done everything possible to work with the Commission in seeking a reimbursement structure that will enable the Commission to meet its statutory obligations to compensate VRS providers for their allowable costs and support meaningful competition for the benefit of the Deaf community without avail:

- Factually demonstrated that GlobalVRS is not being reimbursed for its allowable costs as corroborated by the Fund Administrator;
- Met with CGB on numerous occasions and provided CGB and the Commissioners’ offices with detailed cost data reflecting continued losses;
- Sought an emergency rate freeze extension to enable specialized service providers a degree of rate stability pending implementation of promised Commission reforms and/or establishment of the yet undefined “market based” rate replacement for the glide path reimbursement rate reductions implemented in the 2013 VRS Reform Order and expiring next July;
- Met with Commissioner O’Rielly, Ms. Sauer, and the other Commissioners’ legal advisors; and
- Collaborated with other service providers in seeking an interim reimbursement framework that provides rate stability, promotes competition, and moreover enables smaller and specialized providers to continue serving the Deaf Community under the shadow of a dominant provider whose size eclipses even its closest rival.

¹ See e.g. Convo [Notice of Ex Parte Meeting](#) (September 19, 2016).

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It is unclear what more we can do; it is time for the Commission to act on VRS reimbursement or accept the reality that the Commission - by its seeming inaction in this arena - will quickly exacerbate the very monopoly-based VRS program it and the Deaf Community have sought to prevent.

Under your leadership as Chairman, GlobalVRS urges the Commission to take one or more of the following actions:

- Grant GlobalVRS' emergency rate freeze extension petition;²
- Grant an interim reimbursement rate that compensates specialized and other non-dominant provider allowable costs pending other reforms;
- Authorize providers to be compensated for their reasonable exogenous costs of implementing VRS reforms consistent with past authorization;
- Adopt alternative company-specific, allowable cost reimbursement proposals; and/or
- Delegate interim rate reform authority to CGB and urge CGB to make rate reimbursement a priority and expedite implementation.

You have been an avid champion for the Deaf community, for which we and the Deaf Community will remain forever grateful. Under your leadership, the Commission has made significant strides to achieve functional communications equivalency for the Deaf Community. Yet several of those advancements are on the verge of becoming largely moot pending the likely exit of GlobalVRS and other providers in the absence of expeditious Commission rate reimbursement action. We strongly urge the Commission to act now before its achievements in promoting functional equivalency become largely irrelevant.

Sincerely,

/s/ Angela Roth

Angela Roth
Chief Executive Officer

cc: Commissioners Clyburn, O'Rielly, Pai, Rosenworcel
Commissioners' Legal Advisors (via Email)
Karen Peltz-Strauss (via Email)
Robert Aldrich (via Email)
Eliot Greenwald (via Email)
David Rolka (via Email)
Claude Stout (via Email)
Howard Rosenblum (via Email)

² See, *Structure and Practices of the Video Relay Service program*, CG Docket No. 10-51; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, *Emergency Petition for Extension of the Rate Relief Termination Date on ASL Services Holdings, LLC dba GlobalVRS* (August 12, 2016).